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Electronically Filed: February 14, 2013

6 *Attorneys for Utilities, Inc. of Central Nevada*

7 **UNITED STATES BANKRUPTCY COURT**

8
9 **DISTRICT OF NEVADA**

10 In re:

11 CALDERA P & G,

12 Debtor.

Case No.: 12-22484-LBR

Chapter 11

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**DECLARATION OF WENDOLYN S.W.
BARNETT IN SUPPORT OF MOTION
FOR ORDER COMPELLING DEBTOR
TO PERFORM COURT ORDERED
ENVIRONMENTAL REMEDIATION
OR, IN THE ALTERNATIVE,
MOTION FOR RELIEF FROM THE
AUTOMATIC STAY**

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20 Hearing Date: March 14, 2013

Hearing Time: 10:00 AM

Courtroom: 1

21 I, Wendolyn S.W. Barnett, declare:

22 1. I am presently employed as the Western Regional Director for Utilities, Inc.
which is the parent company of Utilities Inc., of Central Nevada ("UICN"). I have personal
knowledge of the following facts, and, if called as a witness, I could and would testify
competently thereto. I submit this declaration in support of UICN's Motion For Order
Compelling Debtor To Perform Court Ordered Environmental Remediation Or, In The
Alternative, Motion For Relief From The Automatic Stay.

1 2. Since the November 7, 2013 contempt proceedings in State Court, Debtor has still
2 not made any progress in remediation of the ponds. The conditions at the ponds remain
3 unchanged. Indeed, at pond 9a the following conditions persist: the pond liners remain ripped,
4 the water level is periodically low, there is an offensive odor, there is debris in the ponds, debris
5 such as tumbleweeds and trash is frequently around the pond, and significant sediment remains
6 in the bottom of the pond. Many of these problems plague the other ponds as well.

7 I declare under penalty of perjury under the laws of the State of Nevada that the
8 foregoing is true and correct.
9

10 Dated: February 14, 2013.

11 
12 Wendolyn S. W. Barnett
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